

**From:** Bernard Eacock <[bde@bernardeacock.com](mailto:bde@bernardeacock.com)>

**Sent:** 13 February 2019 16:30

**To:** Lewis, Adam (Planning) <[Adam.Lewis@herefordshire.gov.uk](mailto:Adam.Lewis@herefordshire.gov.uk)>

**Subject:** RE: 182135 - Seasonal Workers Accommodation - Burgoynes Lyonshall

Dear Adam,

I apologise for the delay in responding. My client was on Jury Service so could not respond to me immediately.

With respect to your general commentary on RA4, I can only point you to Section 2 of the Planning Statement submitted in support of the application – you are no doubt aware of the company?

As explained, the marquee hire industry is extremely seasonal in nature and during the busy summer months, crews can leave or arrive back at the yard at all times of the day and night. There are understandably tight deadlines for the company to meet when erecting or dismantling marquees and the accommodation will allow workers to maximise rest periods – they regularly get back off one job and have a few hours before setting off on the next. Historically, staff used to occupy portacabins on-site for the same reason but they reached the end of their serviceable life and were removed about 2 years ago. The need for staff to be on-site still remains hence the application. A condition controlling occupancy is acceptable and anticipated by my client.

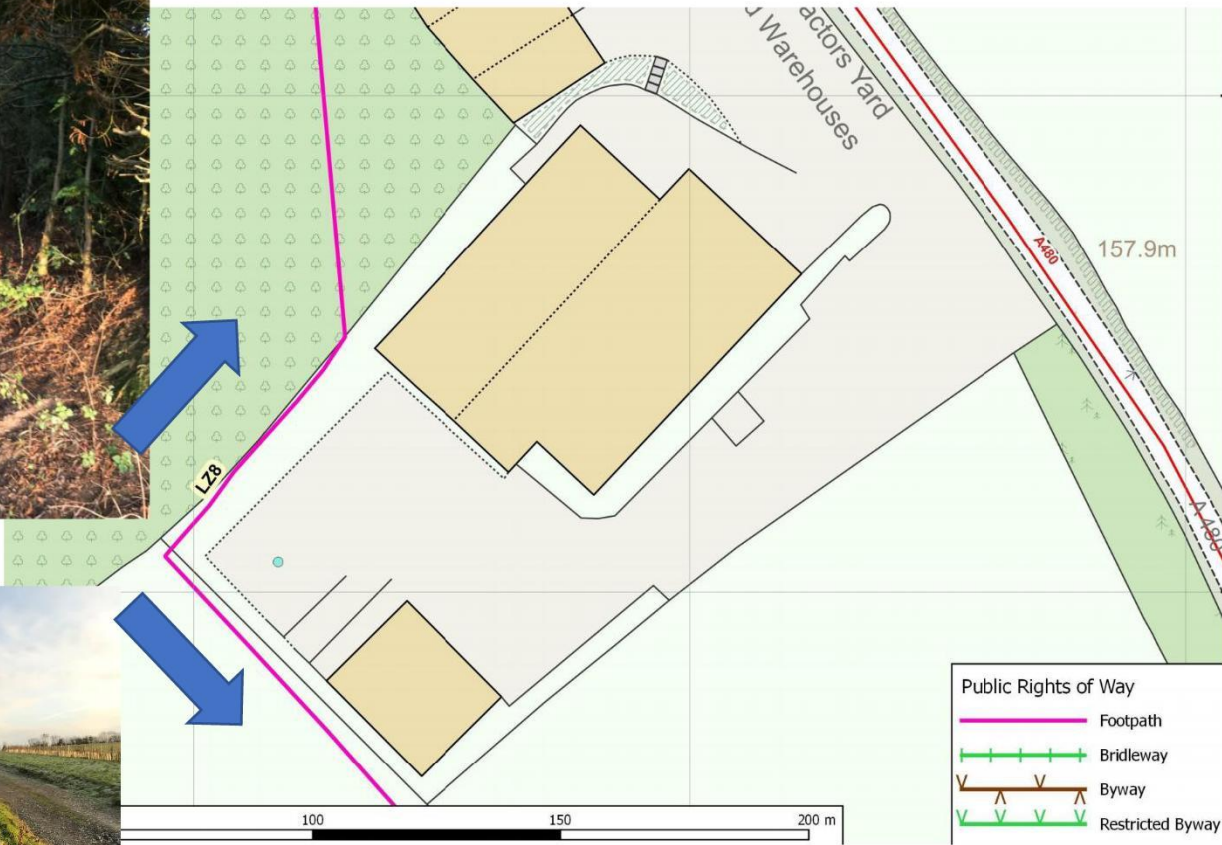
The caravans will be connected to the mains sewer but this will replace the connection which previously existed when portacabins were on-site. Accordingly, the status quo will be maintained as we are talking about accommodating existing staff, not additional staff and as such, there will not be any increase in the amount of sewage emanating from the site. Welsh Water's comments/concerns are therefore largely irrelevant to the consideration of this application which you clearly elude to in your email.

Finally, I attach for your information a document prepared by my client which details the exact route of the footpath in response to the comments of the PROW Officer. I trust this clarifies the situation?

Kindest regards,

**Bernard Eacock** DipTP MRTPI  
Director

**Bernard Eacock Ltd**  
Planning + Architecture





**From:** Lewis, Adam (Planning) [<mailto:Adam.Lewis@herefordshire.gov.uk>]  
**Sent:** 29 January 2019 12:09  
**To:** [bde@bernardeacock.com](mailto:bde@bernardeacock.com)  
**Subject:** 182135 - Seasonal Workers Accommodation - Burgoynes Lyonshall

Dear Mr Eacock,

I write with regards to the above. Please accept my apologies for the delay in dealing with your application.

Having reviewed the proposal, I must advise that I do not consider the proposal has adequately demonstrated compliance with relevant policy. Of particular relevance in this regard is Core Strategy RA4, which broadly requires that proposals demonstrate there is an essential functional need for the residential accommodation to be on site; that the business is financially sustainable; and that the need to provide accommodation cannot be met within existing buildings or facilities. The supporting statement which has supplied does not address these requirements. In order to support the application going forward therefore, we will require a more robust supporting statement to be supplied which provides some more detailed background on the business operation and its functional/staffing needs towards demonstrating that the relevant criteria of RA4 have been satisfied.

Subject to sufficient justification being provided in line with the above, I would be grateful if the following points could also be addressed going forward;

- It is assumed from the application that the caravans are to be sited permanently and not removed from the site during the 'off season'. Please could you confirm if this is correct? Whilst I don't necessarily object to permanent siting, details should also be provided regarding the times of the year the caravans will be occupied so that this can be considered and controlled via condition. So you are aware, a condition would also be attached restricting the occupation of the caravans to employees of the applicant's business only.
- The application indicates the caravans will be connected to the mains sewer network. There are well known issues with capacity at the receiving treatment works in Lyonshall and therefore Welsh Water have recommended the following condition to account for planned upgrade works;

*No buildings on the application site shall be brought into use earlier than 31st March 2020, unless the upgrading of the public sewerage system, into which the development shall drain has been completed and written confirmation of this has been issued to the Local Planning Authority by Dwr Cymru Welsh Water.*

*Reason: To prevent further hydraulic overloading of the public sewerage system, to protect the health and safety of existing residents and ensure no pollution of or detriment to the environment*

From my knowledge of the site and its history of temporary permissions for caravans in this location, I am under the impression the application here is part-retrospective. Therefore the current proposal would not necessarily involve a 'new' connection to the sewer in the truest sense. So that I can discuss this condition with WW, please could you outline the history of the

site, the past occupation of workers caravans in this location and whether these have been connected to the public sewer network.

I look forward to your response to the above at the earliest convenience. I am conscious however that the application is past its target determination date and would therefore be grateful if we could agree an extension of time to account for the above. I would suggest four weeks in the first instance; until 26<sup>th</sup> February. Please let me know if this is acceptable by response.

Best regards

**Adam Lewis**

Senior Planning Officer

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